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November 21, 2023

**VIA ECF**

Honorable Judith C. McCarthy  
United States Magistrate Judge  
Southern District of New York  
The Hon. Charles L. Brieant Jr. Federal Building  
300 Quarropas Street  
White Plains, New York 10601

Re: Marcus Andre Dodd v. My Sisters' Place, Inc.  
Case No.: 1:21:-cv-10987(VLB)

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Dear Judge McCarthy:

We represent Defendants My Sisters' Place, Inc., Karen Cheeks-Lomax, Thomas Rice, and Robert R. Gheewalla (collectively, "Defendants") in the above referenced matter. We submit this joint status letter with Plaintiff Pro Se (Plaintiff Pro Se and Defendants, together shall be referred to as "the Parties") pursuant to Your Honor's November 16, 2023 Order, Dkt. 86, requiring the Parties to file a joint status letter advising the Court as to whether discovery will be completed by November 27, 2023.

On November 17, 2023, via email, the Parties conferred on discovery in this case. Undersigned counsel reported to Plaintiff Pro Se that the authorizations for each of the following records have been submitted and we are waiting receipt of the actual records from Dr. Beatrix Sanchez, Dr. Michael Bell, White Plains Hospital, CA Outsource Associates, Icon MA LLC and New York State Unemployment Insurance Division.

On November 19, 2023, Plaintiff Pro Se provided a list of questions (two) for Defendants' designated expert. Undersigned counsel has communicated with the expert to obtain an estimate of the approximate time and cost to respond. Additionally, undersigned counsel conferred with Plaintiff Pro Se on the following options for a response to the posed questions: (1) an affidavit from the expert answering under oath the written questions or (2) making the expert available for verbal responses to be provided to a court reporter under oath. Plaintiff Pro Se has confirmed that option 1 is acceptable and thus, the Parties will proceed with option 1, the expert will provide an affidavit, under oath, answering the questions posed by Plaintiff Pro Se.

Given that outstanding records from third party providers remain as well as the expert discovery to be completed, the Parties request that discovery remain open for an additional

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two weeks to December 11, 2023, while we gather all outstanding records and facilitate the affidavit of the expert responding to Plaintiff Pro Se's written questions.

We thank the Court for its consideration of this joint request.

Respectfully submitted,



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MAS/PS

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